

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
AT CINCINNATI

ALYSSA PORTNOY & DARLENE
PORTNOY,

Plaintiffs,

v.

NATIONAL CREDIT SYSTEMS, INC.,
ET AL.,

Defendants.

Case No.: 1:17-cv-00834-MRB
Hon. Judge Michael R. Barrett

**NATIONAL CREDIT SYSTEMS, INC.'S RESPONSES TO
PLAINTIFF'S REQUESTS TO PRODUCE**

Pursuant to the Federal Rules of Civil Procedure, National Credit Systems, Inc., (hereinafter, the "Defendant"), hereby submits its responses to the Requests to Produce ("Requests"), propounded by ALYSSA PORTNOY & DARLENE PORTNOY (hereinafter, the "Plaintiffs").

GENERAL OBJECTIONS

1. Defendant generally objects to all of Plaintiffs' Requests to the extent that the Requests call for documents or documents protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege or protection. To the extent that a Request calls for privileged and/or protected documents or documents, Defendant objects and will not produce such documents or documents but will produce a privilege log.

2. To the extent that Defendant, pursuant to any Request propounded by Plaintiffs, produces a document which any party may later claim is privileged or which any party characterizes as privileged, it is understood that such production does not constitute a waiver of the applicable privilege or protection.